

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

:

16 Cr. 436 (KMW)

v.

:

STEVEN BROWN,

:

NOTICE OF MOTION

Defendant.

:

:

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PLEASE TAKE NOTICE, that upon the supporting Memorandum of Law, the undersigned, attorneys for Defendant Steven Brown, will move this Court at the Courthouse located at 500 Pearl Street, New York, New York 10007-1312, before the Honorable Kimba M. Wood, United States District Judge, at a date and time to be determined by the Court, for an order granting the following motions *in limine*:

(a) The government's Rule 404(b) "Other Bad Acts" evidence against Steven Brown should not be admitted;

(b) The Court should exclude or order redaction of documents or recordings containing inflammatory language, including any profane, sexist or otherwise offensive language irrelevant to the matters in dispute at trial;

(c) The Court should exclude the evidence of any irrelevant political commentary, including evidence of the defendant's political affiliation;

(d) The Court should reserve defendant's rights to object to the admission of exhibits;

- (e) The government should be directed to identify how many recorded telephone calls that it intends to offer into evidence during its case-in-chief;
- (f) The government should produce all *Brady/Giglio* material immediately;
- (g) All 3500 material should be produced two weeks before trial; and
- (h) Such other relief as the Court deems just and proper should be granted.

Dated: New York, New York
February 28, 2018

Respectfully submitted,

DOAR RIECK KALEY & MACK

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